REMARKS

Response to Amendment

The Examiner alleges that Applicants have failed to disclose "where in the specification support can be found for the amended (new) claims."

Applicants direct the Examiner attention to, for example, but not limited to, Fig. 8 and page 24, line 3 to page 25, line 22, for support for the new claims.

Claim Objections

Claim 10 is objected to for using non-obvious acronyms, for example, "GBE module." Claim 10 has been amended to recite that "GBE module" means "gigabit Ethernet module." Withdraw of the Examiner's objection is requested.

CLAIM REJECTIONS – 35 USC §112

Claim 10 is rejected under 35 USC 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter. Applicants traverse this rejection.

Claim 10 has been amended to overcome each of the informalities, whether grammatical or substantive. For example, the Examiner alleges that the recitation "for changing public IP address into private IP address by constructing a network to public IP address area and private IP address area" is unclear. Applicants have amended said recitation to "for changing public IP address into private IP address by constructing an integrated network having public IP address area and private IP address area." Support for this amendment may be found, for example, Fig. 8 and page 24, line 3 to page 25, line 22. In this regard, Applicants disagree with the Examiner's interpretation that the quoted recitation means "network changes public IP address into private address." (Emphasis added.) Claim 10 recites that a plurality of switching hubs change public

IP address to private public IP address, **NOT** that "a network" changes public IP address to private public IP address.

Claim 10 has been amended to recite that "GBE" is an acronym for "gigabit Ethernet." Applicants disagree with the Examiner's interpretation that the phrase "a plurality of giga lines for connecting the switching hubs by using a GBE module mounted in each switching hub to thereby integrate the private IP networks into the integrated network," means "a plurality of giga lines for connecting the switching hubs, integrating the private IP networks with into the integrated network." Claim 10 recites that a GBE module is mounted to each of the plurality of switching hubs, and the GBE modules are connected to each other by a plurality of giga lines.

The Examiner further alleges that there is no support for the recitation "integrate the private IP networks into the integrated network." Applicants respectfully disagree. Applicants draw the Examiner's attention to page 25, lines 1-4, where it discloses, "using the router equipment between network companies as in the existing public internet, is constructed by forming the different IDC centers into one identical network in a ring-shaped network with giga lines by means of switching hubs." (Emphases added.) Compare the quoted passage in the previous sentence with the recitation in claim 10, "a plurality of giga lines for connecting the switching hubs by using a gigabit Ethernet (GBE) module mounted in each switching hub to thereby integrate the private IP networks into the integrated network." (Emphases added.) Further support may be found in FIG. 6 and page 22, line 15 to page 23, line 13, and FIG. 8, page 24, line 3 to page 25, line 22. Applicants request reconsideration and withdraw of the Examiner's rejection.

Claim 10 is rejected because the Examiner alleges that "L4 switch" was not defined in the claim. Applicants have amended claim 10 to recite that "L4" means "layer 4." However,

Applicants are not aware that §112, 2nd ¶, requires applicants to define "L4 switch." As know to a person of ordinary skill, L4 switch means, for example, as defined by www.networkworld.com:

> A switch based on an open system interconnection (OSI) "transport" layer, which allows for policy-based switching (for example, limiting different types of traffic on specific end-user switch ports, or for prioritizing certain packet types, such as database or application server traffic).
>
> Layer 4 switches also offer a powerful combination of Network Address Translation (NAT) with higher-layer address screening. In fact, the term "Layer 4 Switch" is really a misnomer: These products may make forwarding decisions based upon information at any OSI layer from 4 through 7, depending upon the particular product. In fact, some of the so-called "Layer 4 Switches" even monitor the state of individual sessions from beginning to end, just as firewalls do, in which case they're referred to as "session switches."
>
> With so much functionality, Layer 4 switches can alleviate server load by balancing traffic across a cluster of servers based upon individual session information and status. Essentially, a Layer 4 switch is placed in front of cluster of servers running a particular application. When a client makes a request for that application, the switch determines which server should handle the request, often based upon current server loads. Once the forwarding decision is made, the switch binds that session to a particular server.

In addition, page 25, lines 16-22, of the specification also defines L4 switch consistent with the definition given above. Applicants request reconsideration and withdraw of the Examiner's rejection.

CLAIM REJECTIONS – 35 USC §103

Claim 10 is rejected under 35 USC 103(a) as being unpatentable over Newman et al. in view of Adrangi et al. Applicants traverse this rejection.

Claim 10 recites that a plurality of switching hubs are connected to giga port of the IDC, and that a plurality of giga lines connect the plurality of switching hubs using a GBE module. In such a configuration, the dispersed IDCs are connected to one another, and a GBL server is capable of performing load balancing between the dispersed IDCs and providing bypass connection path for a first IDC in normal operation, in the event that a second IDC is not working properly.

Newman et al. cited by the Examiner fails to teach or suggest neither the function for providing load balance between IDCs nor the configuration for bypassing connections, which may be provided by connecting the dispersed ICSs as recited in claim 10.

The Examiner also alleges that Newman et al. discloses changing public IP address into private IP address at column 7, lines 15-30. However, the section relied upon the Examiner only states, at best, "connecting a private network to a public requires network address translation," and that generally it is not possible to route private address to a public address. In other words, the section relied upon by the Examiner discuss the difficulty of connecting a private network with a public network.

Note that the section replied upon by the Examiner fails to discloses public/private **IP addresses,** but rather discloses public/private **networks;** in addition, the section relied upon by the Examiner discloses the difficulty of connecting a private network with a public network, not changing a public IP address into a private IP address by a plurality of switching hubs.

In addition, the Examiner fails to disclose where in Newman et al. it discloses that a plurality of switching hub changes a public IP address into a private IP address. Although the

Examiner alleges that Newman et al. discloses a hub (252), Applicants submit that reference numeral 252 refers to a server provider gateway, and Newman et al. discloses that "[t]he server provider gateway 252 direct traffic from each customer to private virtual servers it owns and prevents traffic from reaching private virtual servers customer does not own."

In addition, Adrangi et al. fails to cure any of the deficiencies of Newman et al. noted by Applicants. Accordingly, claim 10 is patentable individually or in combination with respect to the Examiner's cited references.

Claim 11 is rejected under 35 USC 103(a) as being unpatentable over Newman et al. in view of Adrangi et al., and in further view of Rao.

As discussed above, Newman et al. fails to teach or suggest neither the function for providing load balance between IDCs nor the configuration for bypassing connections, which may be provided by connecting the dispersed ICSs as recited in claim 10. Newman et al. also fails to teach or suggest a switching hub configured to assign private IP addresses, rather Newman et al. discloses that "[t]he server provider gateway 252 direct traffic from each customer to private virtual servers it owns and prevents traffic from reaching private virtual servers customer does not own." Also Adrangi et al. and Rao fail to cure any of the deficiencies of Newman et al. noted by Applicants. Accordingly, claim 11 is patentable individually or in combination with respect to the Examiner's cited references.

CONCLUSION

Accordingly, in view of the above amendments and remarks, reconsideration of the objections and rejections and allowance of each of claims 10 and 11 in connection with the present application is earnestly solicited.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact 703-668-8000 at the telephone number of the undersigned below.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 08-0750 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17; particularly, extension of time fees.

Respectfully submitted,

HARNESS, DICKEY, & PIERCE, P.L.C.

By 

Linus Y. Park, Reg. No. 45,261

P.O. Box 8910
Reston, Virginia 20195
(703) 668-8000

LYP/cm